

1 Honorable James L. Robart
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8 UNITED STATES DISTRICT COURT
9 FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

10 NSA SAM,

11 Plaintiff,

12 v.

13 ROBERT D. KELLAMS, a Kent Police
14 Officer and his marital community; JOHN
15 PAGEL, a Kent Police Officer and his marital
16 community; MARK WILLIAMS, a Kent
Police Officer and his marital community;
and CITY OF KENT, a municipal
corporation,

17 Defendants.

18
19 No. 2:16-cv-00811-JLR

20 STIPULATED MOTION TO ALLOW
21 RULE 30(b)(6) DEPOSITION TO OCCUR
22 AFTER DISCOVERY CLOSES

23 NOTED FOR CONSIDERATION:
24 March 9, 2017

25 **STIPULATED MOTION**

26 The parties stipulate and jointly request that the Court permit Plaintiff Nsa Sam to take
a Rule 30(b)(6) deposition of the City of Kent within two weeks after discovery closes. On
February 27, three weeks before the discovery cutoff, Plaintiff properly requested a Rule
30(b)(6) deposition of the City related to training on high-risk stops and training on interpreting
an NCIC and WACIC printout. The City's designee to testify regarding these topics has been
on leave out of state. He returns to work tomorrow, and is scheduled to work all night prior to

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1 each of the two dates Plaintiff's counsel offered for the deposition. The City offered two other
2 dates for the deposition, but Plaintiff's counsel is in California those dates.

3 Accordingly, good cause having been shown, the parties request the Court permit
4 Plaintiff to take this 30(b)(6) deposition by April 3. The remainder of discovery will still close
5 on March 20 as the Court previously ordered.

6 DATED: March 9, 2017

7 CIVIL RIGHTS JUSTICE CENTER,
8 PLLC
9 Attorney for Plaintiff Nsa Sam

MILLS MEYERS SWARTLING P.S.
10 Attorneys for the City of Kent, retired
11 Sergeant Pagel, retired Officer Kellams, and
12 Officer Williams

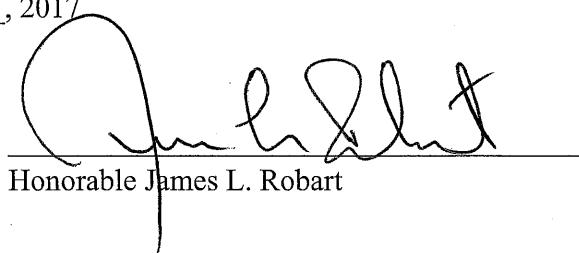
13 By: s/Darryl Parker per 3/9/17 telephonic
14 authority
15 Darryl Parker, WSBA No. 30770
16 Civil Rights Justice Center PLLC
17 2150 North 107th Street, Suite 520
18 Seattle, WA 98133
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23 By: s/Nikki C. Carsley
24 Geoffrey Grindeland, WSBA No. 35798
25 Nikki C. Carsley, WSBA No. 46650
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ncarsley@millsmeyers.com

17 ORDER

18 Based on the foregoing, IT IS SO ORDERED.

19 DATED: 9 March, 2017

20 
21 Honorable James L. Robart

22
23 STIPULATED MOTION TO ALLOW RULE 30(b)(6)
24 DEPOSITION TO OCCUR AFTER DISCOVERY CLOSES
25 (No. 2:16-cv-00811-JLR) - 2

26
LAW OFFICES OF
MILLS MEYERS SWARTLING P.S.
1000 SECOND AVENUE, 30TH FLOOR
SEATTLE, WASHINGTON 98104
TELEPHONE (206) 382-1000
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CERTIFICATE OF SERVICE

I certify that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to:

Ada Ko Wong: ada@akw-law.com, adakowong.esq@gmail.com, paralegal@akw-law.com

Darryl Parker: dparker@civilrightsjusticecenter.com,
ogee@civilrightsjusticecenter.com, amichel@civilrightsjusticecenter.com,
rstefanski@civilrightsjusticecenter.com

I further certify that I mailed a true and correct copy of the foregoing to the following non-CM/ECF participants:

N/A

Dated this 9th day of March 2017.

s/Anna Armitage

Anna Armitage

STIPULATED MOTION TO ALLOW RULE 30(b)(6)
DEPOSITION TO OCCUR AFTER DISCOVERY CLOSES
(No. 2:16-cv-00811-JLR) - 3

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